

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

\_\_\_\_\_X  
T.S.; S.S.; and R.S.,

20 Civ. 8724 (ER)(OTW)

Plaintiffs,

-against-

THE ROCKEFELLER UNIVERSITY  
A/K/A ROCKEFELLER UNIVERSITY  
HOSPITAL F/K/A THE ROCKEFELLER  
INSTITUTE AND THE ROCKEFELLER  
INSTITUTE FOR MEDICAL RESEARCH,

Defendant.  
\_\_\_\_\_X

**[Proposed] ORDER ON PLAINTIFFS' ANONYMITY**

IT IS HEREBY ORDERED that Plaintiffs may proceed on the Court's public docket in this lawsuit using their initials in place of their true names, and that:

1. Within five days of entry of this Order, Counsel of Record for Plaintiffs shall disclose to Counsel of Record for Defendant, in writing, the following information for each Plaintiff:
  - A. name (including maiden name, if any);
  - B. name at the time of the alleged abuse;
  - C. date of birth;
  - D. social security number;
  - E. parents' and/or guardian's names at the time of the alleged abuse;
  - F. current address; and
  - G. address at the time of the alleged abuse, if known.
2. This Order does not diminish in any way the rights that Defendant otherwise would have in the absence of this Order as a litigant in this action, including, but not limited to:
  - A. disclosing Plaintiffs' true names to the Defendant's attorneys, experts, consultants, any persons otherwise retained to provide specialized advice to the University in this action and/or the support staff or vendors employed or retained by such persons;

- B. disclosing Plaintiffs' true names in discovery in this action, including, but not limited to, requests for discovery and information, third-party subpoenas, depositions, and/or communications with persons responding to such requests and/or potential party and non-party witnesses and/or their counsel (including, for example, current and former employees);
  - C. disclosing Plaintiffs' true names in information provided to Defendant's insurance carriers, their counsel, and/or consultants; and
  - D. disclosing Plaintiffs' true names to any referee; special master; and/or mediator, arbitrator, neutral, and/or other person engaged or appointed to facilitate alternative dispute resolution.
3. In any disclosures in Paragraph No. 2 of Plaintiffs' true names by Defendant, Defendant shall instruct any person or entity under Defendant's control or retained by Defendant in this action to whom such disclosure is made to keep Plaintiffs' true names confidential from the public.
4. In any disclosure to a third party not under Defendant's control or retained by Defendant in this action, Defendant will make best efforts not to disclose the caption of this litigation or the fact that Plaintiffs are parties to litigation. In the event an authorization that does not identify a plaintiff as a party to litigation is insufficient to obtain records sought by Defendant, Defendant shall serve with any subpoena for the production of documents a copy of this Order and shall include a cover letter with the subpoena requesting that the receiving party keep the plaintiff's true name confidential from the public.
5. Any party filing a motion or other papers with the Court that contain Plaintiffs' true names or other identifying information shall publicly file the motion or papers in redacted form, via the Court's Electronic Case Filing system, redacting Plaintiffs' true names or other identifying information and, in place of Plaintiffs' true names, setting forth Plaintiffs' initials as applicable. Any party filing a document in redacted form pursuant to this Order shall provide an unredacted copy of the document to the other party's counsel.
6. The parties may seek to modify or amend this Order at any time upon motion to the Court.

SO ORDERED.

Dated: December 3, 2020  
New York, New York



Hon. Edgardo Ramos  
United States District Judge  
Southern District of New York